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UBER TECHNOLOGIES, INC.  
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

WAYMO LLC,  
  
Plaintiff,  
  
v.  
  
UBER TECHNOLOGIES, INC.,  
OTTOMOTTO LLC; OTTO TRUCKING LLC,  
  
Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF THOMAS J.  
PARDINI IN SUPPORT OF  
PLAINTIFF WAYMO LLC'S  
ADMINISTRATIVE MOTION TO  
FILE UNDER SEAL ITS RESPONSE  
TO DEFENDANTS' BRIEF RE  
UNJUST ENRICHMENT PER THE  
COURT'S ORDER (DKT. 2411)**

I, Thomas J. Pardini, declare as follows:

1. I am a member of the Bar of the State of California and an attorney at the law firm of Morrison & Foerster LLP. I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein. I make this declaration in support of Plaintiff Waymo LLC's Administrative Motion to File Under Seal Its Response to Defendants' Brief Re Unjust Enrichment Per the Court's Order (Dkt. 2411).

2. I have reviewed the following documents and confirmed that only the portions identified below merit sealing:

Document	Portions to Be Filed Under Seal
Waymo's Response	Blue Highlights

3. The blue highlights of Waymo's Response contain highly confidential information regarding Uber's past monthly estimated costs for its self-driving car program, as well as its development timeline goals. I understand that disclosure of this information could allow competitors to acquire insight into Uber's detailed past financial information and development timeline strategy, allowing competitors to tailor their own business strategy to the detriment of Uber.

4. Defendants' request to seal is narrowly tailored to the portions of Waymo's Response that merits sealing.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 26th day of December, 2017 at San Francisco, California.

/s/ Thomas J. Pardini

Thomas J. Pardini